

PATENT

REMARKS

The Office Action dated March 30, 2006 has been received and considered. In this response, claims 5 and 7 have been amended. The amendments to the claims do not narrow the scope of the claims and support for the amendments may be found in the specification and drawings as originally filed. Reconsideration of the outstanding rejections in the present application is respectfully requested based on the following remarks.

Rejection of claims 5 and 7

At page 2 of the Office Action, claims 5 and 7 are rejected under 35 U.S.C. § 112. Although Applicant respectfully disagrees with the rejection, claims 5 and 7 have been amended to remove the terms identified by the Examiner. Withdrawal of the rejection and reconsideration of the claims is respectfully requested.

Anticipation Rejection of Claims 1, 3, 5 and 6

At page 3 of the Office Action, claims 1, 3, 5, 6 and 7 are rejected under 35 U.S.C. § 102(b) as being anticipated by Berenguel et al. (U.S. Patent No. 6,389,509). This rejection is hereby respectfully traversed.

Claim 1 recites a sequential load map stored by said control module for storing the order in which data segments are copied from said non-volatile storage media to said memory module during start-up of said solid state disk system. These elements are not disclosed by Berenguel. Berenguel discloses a system for cloning CD-ROM media to a hard drive. *Berenguel*, Abstract and FIG. 2. The Berenguel system includes a "clone map" that identifies portions of the CD-ROM that have been copied to the hard drive. *Id.*, col. 8, lines 27-35. However, in contrast to the assertion of the Office Action at page 4, the clone map of Berenguel is not a sequential load map as recited in claim 1. According to Berenguel

there is a clone map which consists of approximately 1400 bytes in a table (big enough to clone an entire CD-ROM disk), each bit of which maps to one page of data on the CD-ROM disk. When the bit is on, the corresponding page is stored in the clone area of the hard disk.

Id., col. 3, lines 25-30. Thus, the clone map does not store *the order* in which data segments are copied from the CD-ROM, but instead stores data indicating *which pages* have been copied.

PATENT

Accordingly, Berenguel does not disclose a sequential load map stored by a control module for storing the order in which data segments are copied from non-volatile storage media as recited in claim 1.

Claim 3 depends from claim 1. Accordingly, Berenguel fails to disclose each and every element of claim 3, at least by virtue of its dependency on claim 1. In addition, claim 3 recites additional novel elements. For example, claim 3 recites an interface module, upon receiving a read or write request from said computer network, issues a command to said control module to check the load priority queue. These elements are not disclosed by Berenguel. The Berenguel system includes a microprocessor 30 that monitors read requests from a host computer 10. *Id.*, FIG. 1; col. 10, lines 17-22. The read requests are received via a *SCSI bus* 12, rather than a *computer network*. *Id.*, FIG. 1; col. 6, lines 23-27. Accordingly, because Berenguel fails to disclose receiving read or write requests from a computer network, it necessarily fails disclose an interface module, upon receiving a read or write request from said computer network, issuing a command to a control module to check a load priority queue as recited in claim 3.

With respect to claim 5, the claim recites a control module creating a sequential load map identifying the order that segments will be copied from said non-volatile storage media to said memory module. As explained above, Berenguel fails to disclose a sequential load map identifying the order that segments will be copied from non-volatile memory to a memory module. Accordingly, Berenguel necessarily fails to disclose creating a sequential load map identifying the order that segments will be copied from said non-volatile storage media to said memory module as recited in claim 5.

With respect to claims 6 and 7, the claims depend from claim 5. Accordingly, Berenguel fails to disclose each and every element of claims 6 and 7, at least by virtue of their dependency from claim 5. In addition, claims 6 and 7 each recite additional novel elements.

In view of the foregoing, it is respectfully submitted that the Office Action fails to establish that Berenguel discloses each and every limitation of claims 1, 3, 5, 6, and 7. It is therefore respectfully submitted that the anticipation rejection of the claims is improper.

Withdrawal of the rejection and reconsideration of the claims therefore is respectfully requested.

PATENT**Obviousness Rejection of Claims 2 and 4**

At page 6 of the Office Action, claims 2 and 4 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Berenguel et al. in view of Yamagami et al. (U.S. Patent No. 5,592,630). This rejection is hereby respectfully traversed. Claims 2 and 4 depend from claim 1. As explained above, Berenguel fails to disclose or suggest each and every element of claim 1. Further, Yamagami does not remedy the deficiency of claim 1. In particular, Yamagami does not disclose or suggest a sequential load map stored by said control module for storing the order in which data segments are copied from said non-volatile storage media to said memory module during start-up of said solid state disk system as recited in claim 1. Accordingly, Berenguel and Yamagami, individually and in combination, fail to disclose or suggest each and every element of claims 2 and 4, at least by virtue of their dependency on claim 1. In addition, these claims recite additional novel elements.

In view of the forgoing, it is respectfully submitted that the obviousness rejection of claims 2 and 4 is improper. Withdrawal of this rejection and reconsideration of the claims therefore is respectfully requested.

Conclusion

The Applicants respectfully submit that the present application is in condition for allowance, and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number in order to expedite resolution of any issues and to expedite passage of the present application to issue, if any comments, questions, or suggestions arise in connection with the present application.

PATENT

If the Commissioner believes additional fees are due, the Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-3797.

Respectfully submitted,



Adam D. Sheehan, Reg. No. 42,146
LARSON NEWMAN ABEL POLANSKY & WHITE, L.L.P.
5914 West Courtyard Dr., Suite 200
Austin, Texas 78730
(512) 439-7100 (phone)
(512) 439-7199 (fax)

6/30/06
Date